



teenth Amendment. *McDonald v. City of Chicago*, 130 S. Ct. 3020, 3026 (2010); *see also id.* at 3058 (Thomas, J., concurring in part and concurring in the judgment).

2. “[B]roadly prohibitory laws restricting the core Second Amendment right ... are categorically unconstitutional.” *Ezell v. City of Chicago*, No. 10-3525, 2011 WL 2623511, at \*13 (7th Cir. July 6, 2011).

3. The State of Illinois broadly prohibits carrying operable firearms in public. *See* 720 ILCS 5/24-1(a)(4), (a)(10), & 5/24-1.6(a)(1)-(3)(A)&(B). This ban infringes the right of law-abiding individuals to carry firearms for self-defense.

4. Apart from Illinois’s ban, Ms. Shepard and members of ISRA who are otherwise qualified to possess firearms under Illinois law would carry firearms in public for self defense.

5. “The court shall grant summary judgment if the movant shows that there is no genuine dispute as to any material fact and the movant is entitled to judgment as a matter of law.” FED. R. CIV. P. 56(a). For the reasons stated above and in the accompanying memorandum of law, summary judgment is appropriate here.

WHEREFORE, Plaintiffs respectfully request that the Court grant their motion for summary judgment.

Respectfully Submitted,

**MARY E. SHEPARD and THE ILLINOIS  
STATE RIFLE ASSOCIATION,**  
Plaintiffs

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**CERTIFICATE OF SERVICE**

The undersigned attorney states that he caused a true and correct copy of **Plaintiffs' Motion for Summary Judgment**, to be served upon the parties of record, as shown below, via the Court's CM/ECF system on the **8th** day of **August, 2011**.

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